

U.S.D.A.
FSIS/AMS

Product Labeling:
Definition of the Term "Natural"

Written Comments, subsequent to the Public Meetings conducted 12DEC06, 17JAN07

Submitted to: fsis.regulationcomments@usda.gov, natural raised fax 202-720-1112

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Date: 14FEB07, 05MAR07

Comments to the Committee:

While we believe the definition of "Natural" to be "intuitive" and generally understood by the consumer we feel that codification, if that is the word, will clarify the product for the market, the packer/processor and the producer.

Our Position Is:

The consumer believes "Natural" meats to be sourced from animals that are raised naturally. We define "naturally raised" as:

1. Animals raised without the aid of artificially introduced hormones or synthetic growth promotants, and without the use of feed grade antibiotics, fed as a prophylactic to simply enhance growth, feed conversion or to reduce production costs.
2. Animals raised without the use of rendered animal proteins or blood products.
3. Animals fed primarily natural forage, grasses, seeds and/or grains.

All animals are source verified as coming from a "naturally raised" farming operation (ie. USDA process verified, third party audit verified or affidavits from the producer).

The consumer believes "Natural" table cuts (muscle meats) are 100% meat, containing no additives. Table meats are not "pumped" or "enhanced".

Dry rubs contain only "natural" seasonings and spices.

Marinades contain only "natural" liquids, seasonings and spices. Synthesized compounds are not used or injected to increase yields.

Traditional ground, chopped, smoked and cooked meat products using the "natural" name contain only "natural" meats, seasonings and spices. Cooked and smoked meats contain no chemical nitrite or nitrate cures. Natural ingredients with dual properties are "natural".

The term "minimally processed" is problematic, un-definable, and of no value to the consumer.

Thank you for considering our comments

FAX'D 05MAR07

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FAX COVER SHEET

DATE: 05MAR07

TIME:

TO: AMS "naturally raised" COMPANY:

FROM: Patrick Florence, Independent Food Corp., "Salmon Creek Farms"

RE:

CC:

NUMBER OF PAGES INCLUDING COVER SHEET: 2

MESSAGE:

written comment: "naturally raised"

natural label

Source verified